

BellSouth Telecommunications, Inc. 333 Commerce Street, Suite 2101 Nashville, TN 37201-3300

guy.hicks@bellsouth.com

General Counsel

September 14, 2001

615 214 6301 Fax 615 214 7406

Guy M. Hicks

VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996

Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Motion to Amend Procedural Schedule. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch Enclosure BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re:

BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA Service) in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996

Docket No. 97-00309

## BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION TO AMEND PROCEDURAL SCHEDULE

BellSouth Telecommunications, Inc. ("BellSouth") hereby moves the Hearing Officer to amend the procedural schedule in the above-styled matter in light of the Hearing Officer's September 10, 2001, Order. BellSouth respectfully shows the Hearing Officer as follows:

On July 30, 2001, BellSouth filed its Section 271 Application with the Authority. BellSouth did not file testimony on section 272 or on public interest for the reasons set forth in its August 26, 2001 Motion for Clarification. On September 10, 2001, the Hearing Officer issued an Initial Order that clarified the Phase I issues in this matter. As part of the September 10, 2001 Order, the Hearing Officer held that he would consider BellSouth's compliance with section 272 as well as the public interest in the hearing scheduled for October 3, 2001. In accordance with that conclusion, the Hearing Officer gave BellSouth until September 14, 2001 to supplement its testimony.

Given the events of this week, the ordered timeline, and BellSouth's limited regulatory resources, BellSouth regretfully will not be able to comply with this schedule with the level of care and quality that it deems necessary. Further, given

the representations that BellSouth will not ask this Authority to hear this matter prior to an FCC decision in the Georgia 271 case<sup>1</sup>, BellSouth requests

- 1. Initially, that the Hearing Officer cancel the hearings scheduled for October 3, and move the Track A, section 272 and public interest issues to the week of November 5, which the Hearing Officer previously asked the parties to reserve, and
- that the Hearing Officer temporarily defer consideration of the remainder of the section 271 issues (including suspension of testimony filings) until after January 1, 2002.

As to subparagraph 1 above, BellSouth further requests that it be granted additional time to file testimony on the section 272 and public interest issues. Specifically, BellSouth requests that it be granted until October 1, 2001, to file its direct testimony on these issues, and the CLECs be given until October 22, 2001, to file rebuttal testimony on these issues.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

Guy M. Hicks Joelle Phillips

333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300

(615) 214-6301

<sup>&</sup>lt;sup>1</sup> The Georgia Public Service Commission has announced that it will vote on BellSouth's 271 application on October 3, 2001.

Fred McCallum, Jr. Lisa Foshee 675 W. Peachtree Street, Suite 4300 Atlanta, Georgia 30375

## **CERTIFICATE OF SERVICE**

I hereby certify that on September document was served on the parties of overnight or US Mail, addressed as follows:	14, 2001, a copy of the foregoing record, via hand delivery, facsimile,
[ ] Hand [ ] Mail [ ✓ Facsimile [ ] Overnight	H. LaDon Baltimore, Esquire Farrar & Bates 211 Seventh Ave. N, # 320 Nashville, TN 37219-1823 for Qwest (fka LCI), Intermedia, KMC Telecom III and V
<ul><li>[ ] Hand</li><li>[ ] Mail</li><li>[ ✓ Facsimile</li><li>[ ] Overnight</li></ul>	Charles B. Welch, Esquire Farris, Mathews, et al. 205 Capitol Blvd, #303 Nashville, TN 37219 for Time Warner and New South
[ ] Hand [ ] Mail [ ✓] Facsimile [ ] Overnight	Henry Walker, Esquire Boult, Cummings, et al. P. O. Box 198062 Nashville, TN 37219-8062 for XO Communications, ICG, ACSI (e.spire), Brooks Fiber, SECCA and US LEC
[ ] Hand [ ] Mail [ ✓ Facsimile [ ] Overnight	Dulaney O'Roark, Esquire MCI WorldCom, Inc. Six Concourse Pkwy, #3200 Atlanta, GA 30328
<ul><li>[ ] Hand</li><li>[ ] Mail</li><li>[ ] Facsimile</li><li>[ ] Overnight</li></ul>	James P. Lamoureux AT&T 1200 Peachtree St., NE, #4068 Atlanta, GA 30367 for AT&T and TCG MidSouth
[ ]∕ Hand [ ] Mail [ ✔] Facsimile [ ] Overnight	Cynthia Kinser, Esquire Consumer Advocate Division P. O. Box 20207 Nashville, TN 37202

<ul><li>[ ] Hand</li><li>[ ]/ Mail</li><li>[ ] Facsimile</li><li>[ ] Overnight</li></ul>	Enrico C. Soriano Kelley, Drye & Warren 1200 19th St., NW, #500 Washington, DC 20036 for XO Communications
<ul><li>[ ] Hand</li><li>[ ] Mail</li><li>[ ] Facsimile</li><li>[ ] Overnight</li></ul>	James Wright, Esq. United Telephone - Southeast 14111 Capitol Blvd. Wake Forest, NC 27587 for Sprint Communications, LP
<ul><li>[ ] Hand</li><li>[ ] Mail</li><li>[ ] Facsimile</li><li>[ ] Overnight</li></ul>	Guilford Thornton, Esquire Stokes & Bartholomew 424 Church Street Nashville, TN 37219 for BSLD
<ul><li>[ ] Hand</li><li>[ ] Mail</li><li>[ ] Facsimile</li><li>[ ] Overnight</li></ul>	Donald L. Scholes Branstetter, Kilgore, et al. 227 Second Ave., N. Nashville, TN 37219 for CWA
[√] Mail	Andrew O. Isar, Esquire ASCENT 3220 Uddenberg Lane, NW Gig Harbor, WA 98335 for ASCENT
[ ] Hand [ ] Mail [√] Facsimile [ ] Overnight	Jon E. Hastings, Esquire Boult, Cummings, et al. P. O. Box 198062 Nashville, TN 37219-8062 for MCI WorldCom
[ ] /Hand [ / Mail [ ] Facsimile [ ] Overnight	Nanette S. Edwards, Esquire ITC^DeltaCom 4092 South Memorial Parkway Huntsville, AL 35802

<ul><li>[ ] Hand</li><li>[ ] Mail</li><li>[ ] Facsimile</li><li>[ ] Overnight</li></ul>	Andrew Klein, Esquire Kelley, Drye & Warren 1200 19 <sup>th</sup> St., NW Washington, DC 20036 for KMC Telecom
<ul><li>[ ] Hand</li><li>[ ] Mail</li><li>[ ] Facsimile</li><li>[ ] Overnight</li></ul>	John McLaughlin, Jr. KMC Telecom 1755 North Brown Road Lawrenceville, GA 30043
[ ] Hand [ ] Mail [ ] Facsimile [ ] Overnight	D. Billye Sanders, Esquire Waller Lansden, et al. P. O. Box 198866 Nashville, TN 37219-8966 for SBC Telecom